

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF BRIAN D. GLUECKSTEIN
IN SUPPORT OF DEBTORS' MOTION TO ENFORCE THE AUTOMATIC STAY
OR, IN THE ALTERNATIVE, EXTEND THE AUTOMATIC STAY**

I, Brian D. Glueckstein hereby declare as follows:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing FTX Trading Ltd., Alameda Research Ltd., and the other Debtors and Debtors-in-Possession in the above-captioned proceedings. I submit this declaration in support of *Debtors' Motion To Enforce the Automatic Stay or, in the Alternative, Extend the Automatic Stay* ("Motion"), filed concurrently herewith, to place before the Court certain documents and information referred to in the Motion.²

2. Attached hereto as **Exhibit A** is a true and correct copy of a Schedule 13D filed by Samuel Bankman-Fried and Emergent Fidelity Technologies Ltd. on May 12, 2022.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Defined terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. Attached hereto as **Exhibit B** is a spreadsheet containing information derived from a copy of Alameda's general ledger, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, showing transfers from Alameda to EDFM between February 2, 2022 and May 11, 2022, inclusive.

4. Attached hereto as **Exhibit C** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, titled "Re: Transfer of Robinhood Markets, Inc. (NASDAQ: HOOD) Position," dated May 11, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, that is titled "Master Digital Currency Loan Agreement," dated July 15, 2019.

6. Attached hereto as **Exhibit E** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, that is titled "Amended and Restated Master Loan Agreement," dated January 26, 2022.

7. Attached hereto as **Exhibit F** is a true and correct copy of an email, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, sent by Caroline Ellison to Yuri Mushkin and Zachary Prince, dated November 9, 2022.

8. Attached hereto as **Exhibit G** is a true and correct copy of an email, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, sent by Zachary Prince to Samuel Bankman-Fried, dated November 10, 2022.

9. Attached hereto as **Exhibit H** is a true and correct copy of the spreadsheet that is accessible by the hyperlink embedded in the text "liquid assets" in the email attached as Exhibit F.

10. Attached hereto as **Exhibit I** is a true and correct copy of an email, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, sent by Yuri Mushkin to Caroline Ellison, copying others, dated November 9, 2022.

11. Attached hereto as **Exhibit J** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, that is titled "Amendment & Forbearance Agreement," dated November 9, 2022.

12. Attached hereto as **Exhibit K** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, that is titled "Pledge Agreement," dated November 9, 2022.

13. Attached hereto as **Exhibit L** is a true and correct copy of a document, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, that also is titled "Pledge Agreement," and also is dated November 9, 2022, but is different than the document attached as Exhibit K.

14. Attached hereto as **Exhibit M** is a true and correct copy of an email, identified in the Debtors' records during the ongoing investigations into the Debtors' affairs, sent by Zachary Prince to Samuel Bankman-Fried, copying others, dated November 10, 2022.

15. Attached hereto as **Exhibit N** is a true and correct copy of a document titled "Claim Form," filed by Yonathan Ben Shimon on November 17, 2022 in the Antigua Action.

16. Attached hereto as **Exhibit O** is a true and correct copy of an order entered by the High Court of Antigua and Barbuda in the Antigua Action on November 18, 2022.

17. Attached hereto as **Exhibit P** is a true and correct copy of a letter from Toni Shukla to Samuel Bankman-Fried, dated November 21, 2022.

18. Attached hereto as **Exhibit Q** is a true and correct copy of a transcript provided by *Bloomberg Government* of the testimony of John J. Ray III's December 13, 2022 testimony before the House Financial Services Committee.

19. Attached hereto as **Exhibit R** is a true and correct copy of an affidavit filed by Samuel Bankman-Fried in the Antigua Action on December 11, 2022.

20. Attached hereto as **Exhibit S** is a true and correct copy of an affidavit filed by Yonathan Ben Shimon in the Antigua Action, dated November 18, 2022.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in New York, New York on December 22, 2022

/s/ Brian D. Glueckstein
Brian D. Glueckstein